

**One 97 Communications Limited**

**Investor Grievance Redressal Policy**

**Version 1.0**

---

Policy Version	Date of Board approval	Effective Date
Version 1.0	March 03, 2022	March 03, 2022

## Table of Contents

Preamble .....	3
Objective .....	3
Definitions.....	3
Classification of Shareholder Communication.....	4
General Principle guiding classification of shareholders' communication.....	5
Investor Service Timelines.....	8
Investor Grievance Redressal Mechanism.....	8
Investor Contact Details and Escalation Matrix.....	9
Miscellaneous .....	9

## Preamble

One 97 Communications Limited ("Company") strives to follow highest standards of corporate governance, transparency and disclosures at all times. Prompt and efficient service is essential for retaining existing relationships and therefore investor satisfaction becomes critical to the Company. Investor queries and complaints constitute an important voice of the investor. This policy is formulated to provide efficient services to the investors and to effectively address and redress the grievances of the investors in a timely manner and details grievance handling through a structured grievance redressal framework.

The equity shares of the Company are listed on BSE Limited (BSE) and National Stock Exchange of India Limited (NSE). The Company has appointed Link Intime India Private Limited as its Registrar & Share Transfer Agent ("RTA") to ensure faster and efficient provision of services to the investors. The RTA is primarily responsible for handling shareholder-related affairs of the Company.

## Objective

The Investor grievance redressal policy ("Policy") aims at achieving the below stated objectives:

- i. Investors are treated fairly at all times;
- ii. Complaints raised by investors are dealt with courtesy and in a timely manner;
- iii. Investors are informed of avenues to raise their queries and complaints within the organization, and their rights if they are not satisfied with the resolution of their complaints; and
- iv. Queries and complaints are treated efficiently and fairly.

The Board has appointed the Company Secretary to act as Compliance Officer of the Company under the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations"). As Compliance Officer, the Company Secretary is responsible for ensuring provision of prompt and effective services to shareholders and monitoring the dedicated email address of the Company for investor grievances.

## Definitions

For the purpose of this Policy, the following words will carry the meaning as under:

- a. "**Board**" means the Board of Directors of One 97 Communications Limited.
- b. "**stipulated turnaround time**" means the timelines as specified in the Investor Timelines section of this Policy.

The words and phrases not defined under this Policy will carry the same meaning as defined under the Articles of Association of the Company; the Securities and Exchange Board of India Act, 1992 read with the rules and regulations made thereunder, including the Listing Regulations; and the Companies Act, 2013 read with the rules made thereunder.

## Classification of Shareholder Communication

With a view to ensure greater transparency and as a part of Company's investor-friendly initiatives, the Stakeholders Relationship Committee has considered it appropriate and desirable to formally document the present guidelines w.r.t classification of shareholders' communication through this Policy.

The Company receives various correspondence / communication from the investors relating to the shares, annual reports, and other ancillary matters. These communications may either be complaints or mere queries / requests by the shareholders. The Company presently follows a set of guidelines for classifying the shareholders' communication between general correspondence / requests / complaints, etc. These guidelines are internal to the Company.

### General Principle guiding classification of shareholders' communication.

- Multiple correspondence / communications or reminders received for the same matter within the stipulated turnaround time in this Policy for handling of the query / communication will be treated as one correspondence/complaint.
- If a query is resolved after the stipulated turnaround time and there is no reminder from the shareholder during such time period, such query will not be treated as complaint.
- In case of any ambiguity, the Company Secretary shall be the sole authority to decide on the nature and classification of the communication and the decision of the Company Secretary shall be final and binding.

### Classification of shareholders' communication

Sr. No.	Communication not treated as complaint	Communication treated as complaint
a.	Non-receipt of Annual Report	
	First request or any such communication w.r.t. non - receipt of annual report will be considered as a request if, the Company has dispatched the annual report to the shareholder on or before the due date(s) through permissible means.	Subsequent request(s) for non-receipt of annual report to be treated and recorded as a complaint if:
	Such communication shall be treated as request for an additional copy of the annual report. Company shall respond to the request by intimating the original date of dispatch of annual report and will also share a copy of the annual report in compliance with the shareholder's request.	⇒ the Company / RTA has not dispatched the annual report to the shareholder on or before the stipulated turnaround time, or ⇒ the Company / RTA has not responded to shareholder's request within the stipulated turnaround time.

b.	Non-receipt of Dividend, whenever declared	
	<p>First request or any such communication w.r.t. non-receipt of dividend will be considered as a query /request if, the Company has credited the dividend to the bank account of the shareholder or dispatched dividend warrants / demand drafts on or before the due date(s).</p> <p>When the Company is unable to pay out the dividend:</p> <p>⇒ In case where the dividend is to be credited to the bank account of the shareholder, and such credit has been declined by the bank, the Company will pay out the dividend through a dividend warrant / demand draft in favour of the shareholder.</p> <p>⇒ In case the dispatched dividend warrant / demand draft is returned undelivered, the Company will proceed with re-dispatching the dividend warrant / demand draft only upon a written request by the shareholder. Such communication from the shareholder will be treated as a request and not a complaint.</p>	<p>Any communication w.r.t. non-receipt of dividend warrants / demand drafts sent to the Company or to the RTA after the expiry of the stipulated turnaround time for issuance of duplicate dividend warrant/demand draft will be considered as complaint.</p>
c.	Non-receipt of share certificates	
	<p>Non-receipt of duly authenticated share certificate(s) upon sub-division / transmission / consolidation / re-materialization will be considered as a query if, the Company has dispatched the share certificates within prescribed time limits.</p> <p>The Company shall respond to the query by sharing details of dispatch to the shareholders. It is clarified that upon the dispatch of share certificate through registered post or courier or any other approved mode, the Company shall be deemed to have discharged its</p>	<p>Communication w.r.t. non-receipt of duly authenticated share certificate(s) after the expiry of the statutory period for giving effect to the respective request will be treated as a complaint if, the Company has not dispatched the share certificates to the shareholder.</p>

	duty and the shareholders are expected to coordinate with the postal / courier agency for the share certificates dispatched.	
d.	Shareholder communication through statutory authorities	
	<p>Any communication from investors through statutory authorities which:</p> <ul style="list-style-type: none"> <li>⇒ is not treated as a complaint by the statutory authority, and</li> <li>⇒ which would not have been treated as a complaint by the Company if it was directly addressed to the Company, will not be treated as a complaint.</li> </ul>	<p>At times, requests / grievances are directly communicated to the statutory authorities by the investors. Such communications may not always qualify as a complaint under the guidelines adopted by the Company.</p> <p>However, since the statutory authorities treat all communication received from investors as complaint, regardless of the nature of such communication, the Company is constrained to follow the classification as followed by the statutory authorities.</p> <p>Accordingly, any communication from investors received through statutory authorities viz. stock exchanges, Registrar of Companies, Regional Directors, SEBI etc. which is treated as complaint by such statutory authority, will be treated as a complaint by the Company.</p>

e.	Other shareholders request	
	<p>i. Correspondence w.r.t. change in address, nominee etc. will be considered as a request and not as a complaint if, the request is addressed within the stipulated turnaround time.</p> <p>ii. Any communication requisitioning information or documents relating to the Company or its operations as per statutory rights available to the shareholders will be treated as request if, the requisition is in proper format and the Company has responded to the same within prescribed time limits.</p> <p>iii. Incomplete communications, communications without requisite supporting documentation or DP ID / Client ID.</p>	Any communication, if not responded to by the Company/RTA within the stipulated turnaround time will be considered as complaint.
f.	Other communication	
	<p>i. Any communication / suggestions / enquiry about procedures for any action will be considered as a request / general enquiry and not a complaint.</p> <p>ii. or any communication which is vague or nonspecific in nature, will not be treated as a complaint.</p> <p>iii. any other request/query/communication for which Company is not statutorily required to respond, will not be treated as complaint under this Policy.</p> <p>iv. Communications / complaints in relation to matters that are sub- judice, will not be treated as a complaint under this Policy</p>	-

### Investor Service Timelines

The Company and its RTA shall endeavour to follow below timelines for performance of its duties toward shareholders:

- a. Matters such as change of address, non-receipt of annual report and updation of bank/email details are addressed by the RTA within a period of 10 days from the receipt of the request. In case, any supporting documents are required by the RTA from the shareholder for addressing the request, such matters will be addressed within a period of 10 days from the receipt of such documents to the RTA's satisfaction.
- b. Matters other than those referred in point (a) above, including but not limited to change of name, dematerialisation, rematerialisation and issuance of share certificate on loss / sub-division / consolidation, are addressed by the RTA within a period of 15 days from the receipt of the request. In case, any supporting documents are required by the RTA from the shareholder or any other party for addressing the request, such matters will be addressed within a period of 15 days from the receipt of such documents to the RTA's satisfaction.
- c. Matters related to transmission of shares shall be addressed by the RTA, within a period of 7 days from the date of request. In case, any supporting documents are required by the RTA from the shareholder or any other party for addressing the request, such matters will be addressed within a period of 7 days from the receipt of such documents to the RTA's satisfaction.

In case statutory timelines for redressal of any grievance have been prescribed, the Company / RTA shall address such grievance within the timeline as prescribed under law.

### Investor Grievance Redressal Mechanism

- a. Investors can lodge a complaint for non-receipt of any document/right available to them or failure of the RTA / Company to comply with any statutory obligation by giving details of their name, folio no., DP ID / Client ID, nature and full particulars of their complaint directly to the RTA.
- b. Any information, other than those specified above or any supporting documentation required for redressal of the complaint shall be informed to the investors by the RTA. Investors are requested to furnish all the requisite information along with duly executed documents at the earliest to avoid any delay in redressal of their complaints.
- c. In case of non-satisfactory response from RTA within the stipulated timelines, investors can also lodge their complaints through the Company's designated email id for investor grievances at [compliance.officer@paytm.com](mailto:compliance.officer@paytm.com). The designated email id is also displayed on the Company's website. Alternatively, investors can send their complaints at the registered office of the Company.
- d. If the investor does not receive a reply from the RTA within the stipulated turnaround time, he / she may approach the Company at the credentials mentioned above. **Additionally, investors are urged to refrain from sending multiple reminders during the above-**



**mentioned turnaround periods for redressal of their complaints.**

- e. Investors are requested to approach the RTA, or in case of any inaction by the RTA, the Company, for redressal of their concerns prior to raising their concerns with the regulatory authorities.
- f. Only complaints sent on the addresses / email ids mentioned in this Policy will be treated as valid complaints. Email received from the registered email id of shareholder/letter received under the signature of shareholder shall be treated as valid communication/compliant.
- g. The Company is registered in the Scores platform of SEBI for redressal of investor grievances.
- h. The Company periodically obtains status report of the complaints from the RTA and report the same to the stock exchanges & place it before the Board / Stakeholders Relationship Committee.
- i. The Stakeholders Relationship Committee is responsible for the examination and redressal of the complaints by investors.

**Investor Contact Details and Escalation Matrix**

	<b>Contact details</b>	<b>Address</b>
<u>Level I</u>  Registrar & Share Transfer Agent (RTA)	Mr. Vishal Kumar Email: <a href="mailto:delhi@linkintime.co.in">delhi@linkintime.co.in</a> Website: <a href="http://www.linkintime.co.in">www.linkintime.co.in</a>	Link Intime India Private Limited Noble Heights, 1st Floor, Plot NH 2, C-1 Block LSC, Near Savitri Market, Janakpuri, New Delhi - 110058  Tel.No. +91 011-49411000
<u>Level II</u> <u>Company</u>	Company Secretary Email: <a href="mailto:compliance.officer@paytm.com">compliance.officer@paytm.com</a> Website: <a href="http://www.paytm.com">www.paytm.com</a>	One 97 Communications Limited One Skymark, Tower D, Plot No. H-10B, Sector - 98, Noida-201304.  Tel. No.: +91 120 4770770

**Miscellaneous**

The Stakeholders Relationship Committee has been vested with the power to amend the Policy from time to time.

Notwithstanding anything contained in this Policy, in order to give effect to any changes / amendments notified by the Ministry of Corporate Affairs or Securities and Exchange Board of India, the Compliance Officer is authorised to amend the Policy suitably.

The amended Policy shall be placed before the Stakeholders Relationship Committee for its approval and before Board of Directors for noting and ratification.